

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ROWENA WAGNER,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	CIVIL ACTION
	:	NO. 04-264 ERIE
CRAWFORD CENTRAL SCHOOL DISTRICT,	:	
	:	
CRAWFORD CENTRAL SCHOOL BOARD,	:	Defendant Crawford
	:	Central Education
Defendants,	:	Association's
	:	Answer To
MICHAEL E. DOLECKI, SUPERINTENDENT,	:	Plaintiff's First
	:	Amended Complaint
Defendant,	:	
	:	
CHARLES E. HELLER, III,	:	
ASSISTANT SUPERINTENDENT	:	
	:	
Defendant,	:	
	:	
and	:	
	:	
THE CRAWFORD CENTRAL	:	
EDUCATION ASSOCIATION,	:	
	:	
Defendant.	:	
	:	
		Filed on Behalf of Defendant
		Crawford Central Education
		Association
		Counsel of Record:
		OWEN R. KENNEY, Esq.
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FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROWENA WAGNER, :
Plaintiff, :
vs. :
CIVIL ACTION
NO. 04-264 ERIE
CRAWFORD CENTRAL SCHOOL DISTRICT, :
CRAWFORD CENTRAL SCHOOL BOARD, :
Defendants, :
MICHAEL E. DOLECKI, SUPERINTENDENT, :
Defendant, :
CHARLES E. HELLER, III, :
ASSISTANT SUPERINTENDENT :
Defendant, :
and :
THE CRAWFORD CENTRAL :
EDUCATION ASSOCIATION, :
Defendant.

**Defendant Crawford Central Education Association's
Answer To Plaintiff's First Amended Complaint**

AND NOW, Defendant Crawford Central Education Association ("Association"), by and through its attorney, Owen R. Kenney, Esq., files the following Answer To Plaintiff's First Amended Complaint:

Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining averments of Paragraph 4, therefore, all remaining averments in Paragraph 4 are denied.

5. Admitted.

6. Admitted in part, Denied in part. Defendant admits that the Association is affiliated with the Pennsylvania State Education Association ("PSEA").

Defendant denies that Plaintiff is a member of the Association. As Plaintiff is not a member of the Association, Defendant denies that Plaintiff's position as a day-to-day/per diem substitute teacher grants her any rights afforded Association members. Defendant denies all remaining averments in Paragraph 6.

7. Admitted.

8. Defendant is without knowledge or information sufficient to form a belief as to the truth of the averment, therefore, the averment is denied.

9. Admitted.

10. Denied.

11. Admitted in part, Denied in part. Defendant admits that Plaintiff was hired as a day-to-day/per diem substitute teacher to replace a full-time teacher who had taken a leave of absence for medical purposes.

Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining averments, therefore, the remaining averments in Paragraph 11 are denied.